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ABSTRACT

A collection of documents related to the "Proposed Standards and Guidelines for the Depository Library System for U.S. Government Publications" forms this report. The principal document is a section-by-section analysis of the Proposal, and compilation of reactions by documents librarians which was prepared for the Federal Documents Task Force, Government Documents Round Table, American Library Association. The following related documents are also included: copy of the Proposed Standards and Guidelines; Government Printing Office analysis of the early response to an invitation for comments from individual librarians; and an analysis of the statutory authority and legal requirements for "Congressional" and "Law" designations of depository libraries. (Author)

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REACTIONS TO
PROPOSED STANDARDS AND GUIDELINES
FOR THE
DEPOSITORY LIBRARY SYSTEM

Compiled by

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Prepared for

Federal Documents Task Force
Government Documents Round Table
American Library Association

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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College Park, Maryland
September 1976

IR 003 988

REACTIONS TO PROPOSED STANDARDS AND GUIDELINES FOR THE DEPOSITORY LIBRARY SYSTEM

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American Library Association

INTRODUCTION

This report consists of a collection of documents related to the Proposed Standards and Guidelines for the Depository Library System which were approved by the Depository Library Council to the Public Printer in October 1975. These were published as a Special Supplement to Public Documents Highlights, Number 13, December 1975. (attached as Appendix A) The principal document in this collection is an analysis of the Proposal and a compilation of reactions to it which was prepared by Rebekah Harleston for the Federal Documents Task Force, Government Documents Round Table (GODORT). (attached as Appendix B)

Also included in this collection are the following documents:

(1) Letter, dated March 22, 1976 from the Director, Library and Statutory Distribution Service, Government Printing Office to the Coordinator, Federal Documents Task Force. (attached as Appendix C) The analysis and compilation of reactions mentioned above (i.e. Appendix B) was prepared in response to this request.

(2) Analysis of Proposed Standards and Guidelines for Depository Libraries, prepared by LeRoy C. Schwarzkopf, dated March 22, 1976. (attached as Appendix D) This analysis was submitted in response to the invitation of Editor, Public Documents Highlights in issue Number 13, December 1975. It is also a basic reference to the compilation of reactions mentioned above.

(3) Response to the Request for Comments on the Proposed Standards and Guidelines. (attached as Appendix E) This document is a status report on the response to the invitation for comments published in Public Documents Highlights, Number 13, December 1975. It was presented by the Editor at the spring meeting of the Depository Library Council to the Public Printer in Columbus, Ohio, April 22-23, 1976.

The Depository Library System for U.S. Government Documents had its origins in the early 19th century. The current statutory authority for the program is Chapter 19, Title 44, United States Code. The purpose of the depository library system is to make U.S. government documents freely available to citizens throughout the country. A minimum of two depository libraries are authorized for each congressional district, and there are at present approximately 1,200 designated depository libraries. Current regulations implementing the statutory authority were published by the Superintendent of Documents in Instructions to Depository Libraries, Revised July 1974.

The Depository Library Council to the Public Printer was established in February 1973. Its purpose is to advise the Public Printer and the Superintendent of Documents on the needs of depository libraries, the cataloging and indexing of federal documents, and the availability of U.S. government documents through the depository library system and the GPO sales publications program. The work of the Council has been carried on by committees formed from its 15 members. The committees have had various charges and titles since the establishment of the Council. One of these was the Committee on Standards whose primary activity has been preparation of the proposed standards and guidelines. These were intended to be based on, and expand the statutory authority and implementing regulations. They were designed primarily to assist representatives of the Superintendent of Documents in inspections of depository libraries.

Draft proposals were prepared during 1974 and were discussed at the meetings of the Council in Washington, D.C., October 29-30, 1974 and in Storrs, Connecticut, April 14-15, 1975. A final proposal was presented at the fall meeting in Washington, D.C., October 23-24, 1975 when the Council accepted the following recommendations of the Standards Committee.

(1) To publish the Proposed Standards and Guidelines in Public Documents Highlights;

(2) To extend the use of the Proposed Standards and Guidelines in the Depository Library Inspection Program provisionally for another year; and

(3) To send copies to other professional groups inviting comment. These groups included the ALA Government Documents Round Table, ALA Ad Hoc Committee on the Depository Library System, American Association of Law Libraries, and the Special Libraries Association.

The Federal Documents Task Force, Government Documents Round Table has followed the development of the Proposed Standards and Guidelines throughout this period. An earlier edition of the draft proposal was published in the newsletter of the Government Documents Round Table, Documents to the People (DttP)(vol. 3, no. 3, January 1975, pp. 23-28). On April 2, 1975 the Task Force had asked for comments on that part of the Proposal dealing with requirements to maintain a basic reference collection and to select a minimum number of items to retain depository status. (see DttP, vol.3, no. 5, May 1975, pp. 25-27). The results of

this inquiry were reported at the ALA Annual Conference in July 1975, and were published in Documents to the People (vol. 3, no. 7, September 1975, pp. 19-20).

Anticipating a request for comments from the Superintendent of Documents, the Task Force's Work Group on Depository Libraries had on February 9, 1976 sent a request for comments to 50 plus documents librarians who had expressed in interest in the activities of the Work Group. A request for comments from GODORT members was also published in DttP (vol. 4, no. 2, March 1976, p. 55) At the meeting of the Work Group on Depository Libraries, during the ALA Midwinter Conference in January 1976, Rebekah Harleston, Documents Consultant, University of Kentucky Libraries had volunteered to compile the comments from GODORT members which were received in response to these two requests. She was also asked to independently analyze the Proposed Standards and Guidelines, section by section, and to prepare a report which could be submitted to the Superintendent of Documents in response to the request sent by the Director, Library and Statutory Distribution Service, dated March 22, 1976. (attached as Appendix C) This report (attached as Appendix B) was submitted to the Task Force on Federal Documents during the ALA Annual Conference in July 1976 and was subsequently forwarded to the Director, Library and Statutory Distribution Service for consideration by the Council.

At the meeting of the Depository Library Council to the Public Printer in Columbus, Ohio, April 22-23, 1976 the Editor, Public Documents Highlights submitted a progress report on the response to his invitation for comments published in the December 1975 issue. This report is attached as Appendix D. One of the more significant comments was submitted by LeRoy C. Schwarzkopf, Government Documents Librarian, University of Maryland. These comments are also referred to the Federal Documents Task Force report and are therefore attached as Appendix D.

APPENDIXES

A - Public Documents Highlights, Number 13, December 1975 (p.1) with Special Supplement, Proposed Standards and Guidelines
B - Reactions to Proposed Guidelines for the Depository Library System, compiled by Rebekah Harleston, July 1976
C - Letter, March 22, 1976, from Director, GPO Library and Statutory Distribution Service to Coordinator, Federal Documents Task Force, Government Documents Round Table
D - Analysis of Proposed Standards and Guidelines for Depository Libraries, by LeRoy C. Schwarzkopf, March 22, 1976
E - Response to the Request for Comments on the Proposed Standards and Guidelines, by the Editor, Public Documents Highlights, April 22,1976

APPENDIX A

public documents
highlights

U.S. Government Printing Office | December 1975 Number 13 GP 3.27:13 | (Superintendent of Documents) Assistant Public Printer

Standards and Guidelines

A special supplement to this issue of Highlights contains the eagerly awaited "Proposed Standards and Guidelines." There are three parts: (1) Proposed Minimum Standards for the Depository Library System; (2) Proposed Guidelines for the Depository Library System; and (3) Proposed Changes to the Minimum Standards and Guidelines for the Depository Library System Which Require Legislative and Administrative Action.

These "Proposed Standards and Guidelines" have grown out of the research and discussions of the librarians who make up the Depository Library Council to the Public Printer. Your comments and suggestions on the "Proposals" are invited by the Council. You can help to shape the final version. Send communications to: Editor, Public Documents Highlights, Library and Statutory Distribution Service, Government Printing Office, Washington, D.C. 20401.

Easy Ordering From GPO

For the quickest response or turnaround time in a mail order to GPO:

(1) Use the Superintendent of Documents order form available free from:

Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

Include a self-addressed mailing label.

(2) Open a Deposit Account, minimum $50; send to same address. The older system of purchasing coupons of various denominations from GPO is in the process of being phased out, so avoid writing for these.

(3) Use the **single item** technique—that is, request only one item per order form and provide a mailing label for each order.

(4) Include Superintendent of Documents catalog number and stock number if available for each title ordered. Try to get correct title if possible.

Utilize the Philadelphia and Pueblo Distribution Centers by:

(1) Getting on the mailing list for the monthly periodical, **Selected U.S. Government Publications**, same address as above.

(2) Use this as an announcement/selection tool. Order publications from the **Selected List** on the order form provided in each issue. Mail the order to the address

SPECIAL SUPPLEMENT TO
public documents
highlights
(December 1975)

Proposed Standards & Guidelines

PROPOSED DEPOSITORY LIBRARY SYSTEM MINIMUM STANDARDS FOR THE

The objective of the depository library system is to make U.S. Government publications readily accessible for use by the general public and to insure their continued availability in the future.

MINIMUM STANDARDS

The Depository Library Program

1. The Superintendent of Documents will be responsible for distribution of documents to depository libraries in accordance with the provisions of Title 44 of the United States Code.
2. The Superintendent of Documents will provide a comprehensive system of catalogs, bibliographies and indexes to U.S. Government publications.
3. There should be at least one selective depository accessible to the public in each Congressional district. The designated library shall have the interest, resources and ability to provide custody of the documents and public service. The library must contain at least 10,000 books other than government publications.
4. Each depository shall select and maintain a collection responsive to the needs of the users in the geographic area it serves and promote their use by the general public.

The Depository Library

5. The collection in a depository library shall be organized to insure quick and easy access by library users. The library will promptly open shipments and claim publications selected but not received.
6. The collection shall be maintained in as good physical condition as the other collections in the library.
7. Each depository library will assign sufficient staff to select, organize and provide reference service to the collection.
8. Each depository will provide sufficient space of a quality which conforms to ALA standards for the type of library.
9. The depository will be open to the public for free use of depository publications.
10. Each depository library will cooperate with the instructions issued by the Superintendent of Documents, respond promptly to the **Biennial Survey** and to other communications from the Public Documents Office.

Interlibrary Cooperation

11. All depository libraries shall be considered part of a national system to make Government documents available.
12. All selective depositories should be served by a regional depository. The regional depository libraries will retain at least one copy of all Government publications either in printed or microfacsimile form (except those authorized to be discarded by the Superintendent of Documents) and within the region served will provide interlibrary loan, reference service, and assistance for depository libraries in the disposal of unwanted Government publications.

Submitted by
the Committee on Standards
Depository Library Council
To the Public Printer

PROPOSED GUIDELINES FOR THE DEPOSITORY LIBRARY SYSTEM

1. Objectives of the Depository Library System

1–1 The purpose of depository libraries is to make U.S. Government publications easily accessible to users and to insure their continued availability in the future.

§ 1–2

2. Superintendent of Documents, U.S. Government Printing Office

2–1 Obtain new federal publications and forward free of expense to depository libraries as expeditiously as possible.

* 2–2

2–3 Provide all numbers of series in the **List of Classes of United States Government Publications Available for Selection by Depository Libraries**, including those numbers not printed at the Government Printing Office. (See also **proposed changes** 1.b.)

2–4 Actively gather and distribute in paper or microformat all unrestricted Federal publications of reference value not printed at the Government Printing Office.

2–5 Provide samples and/or annotations for new titles offered to depositories, and return cards for selection purposes.

2–6 Subdivide item numbers as necessary to insure that libraries need receive only wanted documents.

2–7 Supply shipping lists containing item numbers, titles of documents, classification numbers and order information with each day's shipment of depository selections.

2–8 Supply forms for claiming.

2–9 Offer choice of format, paper, microform or other format; however, the GPO with consultation with the depository, should have the option of providing only one format when the nature of the material warrants it.

2–10 Provide a comprehensive system of catalogs, bibliographies and indexes to Federal publications. (See Proposed changes 2 b, 11/7/74)

2–11 Provide a standard classification system for Federal documents and related aids such as lists of subject headings.

2–12 Provide assistance to libraries on problems of using the Sudocs system of classification.

2–13 Maintain a library to become the National Depository Library.

2–14 Issue instructions for the selection, claiming, retention, withdrawal and other activities related to depository libraries.

§ Reserved for new material

* Deleted. See proposed changes 11/7/74 § 1 a

2–15 Provide additional funds for the evaluation of depository libraries through questionnaires, surveys, and inspections at intervals considered necessary by the Superintendent of Documents, to insure compliance with the depository law.

2–16 After advance notice to the library concerned, investigate unsatisfactory conditions in depository libraries by personal visits. (See **Proposed changes** 1.c, 11/7/74)

2–17 Provide written notice to a library about unsatisfactory conditions, and if not corrected within six months, delete the library from the list of depositories.

2–18 Announce new policies and changes on a regular basis to all depositories.

2–19 Cooperate with publication projects which contribute to use of Federal Documents.

2–20 Consult with an Advisory Council on matters related to depository libraries, including the development of standards.

2–21 Collect, compile, analyze and report statistics on a regular basis.

§ 2–22

3. Designation of new depository libraries

3–1 There may be up to two depositories in each Congressional district, designated by representatives, two at large designated by Senators, and other depository libraries specifically provided for in the depository law.

3–2 The library shall be open for free use of the general public, except as provided in U.S. Code, Title 44.

3–3 The library shall have the interest, resources and ability to provide custody of the documents and public service.

3–4 Minimum size of library. The library should possess at least 10,000 books other than government publications. (See Proposed changes 3.b 11/7/74)

* 3–5

3–6 Hours of service. Documents collections should be open the same hours as other major parts of the library, when the library is open for full range of services.

3–7 When there is a vacancy in a Congressional district, the fact should be made known to the state library authority, the state professional associations and the depositories within the region.

3–8 Eligible libraries shall apply to the state library authority for evaluation and recommendation. The library must be prepared to offer statistics on the size and character of its collection,

§ Reserved for new material

* Deleted

population served, budget, and if an academic library, the size of the student body, and need for research materials.

3-9 The evaluation must relate to community interests and indicate staff, space and budget to be allocated to the collection and the number, scope and character of the items to be selected. The State library authority shall consult with the librarians of other depositories in the Congressional District and the regional depository, if any, representatives from the professional association will make a recommendation based on location in relation to other depositories, the need for an additional depository and the ability of the library to provide custody and service. (See **Proposed changes** 3.a 11/7/74)

§ 3-10

4. Collections

4-1 Each depository library should maintain a basic reference collection available for immediate use consisting of all titles in Appendix A (attached).

4-2 Each library will acquire and maintain the basic catalogs, guides and indexes, retrospective and current, considered essential to the reference use of the collection. This should include selected non-governmental reference tools. (Appendix B, to be compiled).

4-3 Each depository will select frequently used and potentially useful materials appropriate to the objectives of the library.

4-4 Each depository will select materials responsive to the needs of the users in the Congressional district it serves. (See **Proposed changes** 4.6, 11/7/74)

4-5 Selection of at least 25% of the available items on the **Classified List** is suggested as the minimum number necessary to undertake the role of depository library. (See **Proposed changes** 4.a, 11/7/74)

4-6 Coordinate selections with other depositories in the district.

§ 4-7

5. Organization of collection.

5-1 The library will check all daily shipping lists to insure that items selected are received, and if not, promptly claimed.

5-2 Each publication in the shipment should be marked with the word "depository" and the date of the Shipping List according to the **Instructions to Depository Libraries,** Revised July 1974.

5-3 The library will record its accessions.

5-4 The minimum record for a depository library should be a shelf list which shows the library's holdings and the call numbers or locations where they may be found.

5-5 A standard classification system should be adopted for precise identification and location of materials requested by library users.

5-6 The classification adopted shall be optional with library; however, it is recommended that libraries which integrate their documents should maintain a shelf list by Sudocs number showing disposition of the publication.

5-7 Any document should be available for public use within 10 days after receipt.

5-8 Maintain statistics of the collection, needed for the Biennial Survey.

§ 5-9

6. Maintenance of the collection.

6-1 Collections should be maintained in good physical condition as other library materials.

* 6-2

* 6-3

6-4 Lost materials should be replaced if possible.

6-5 Unneeded publications should be made available to other libraries.

6-6 All publications should be retained for a period of at least five years before requesting permission from the regional library for disposal.

§ 6-7

7. Staffing

7-1 One person shall be designated by the library to coordinate activities and to act as liaison with the Superintendent of Documents in all matters relating to depository libraries.

7-2 This person shall be responsible for

a) selection, receipt and claiming of depository distributions

b) replies to correspondence and surveys from the Public Documents Department

c) interpret the depository program to the Administrator of the library

d) performance and/or supervision of stated aspects of service, or in an integrated collection, a knowledge of to whom responsibilities are delegated.

(1) organization for use
(2) maintain records of the collection
(3) physical maintenance of the collection
(4) establish withdrawal procedures
(5) maintain reader services
(6) promote use of collection
(7) prepare budgets
(8) submit reports

7-3 The liaison person should be a professionally qualified librarian with a minimum of two years

§ Reserved for new material

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* Deleted

library experience.

7–4 The liaison person should be directly responsible to the administrative level of the library.

7–5 Additional professional staff should be added depending on the size and scope of the library and the methods of organization of the collection.

7–6 Professional staff will be assisted by support staff in a proportion of 1 to 3, and no greater than 1 to 5.

7–7 Librarians and such support staff as indicated by their responsibilities will keep up to date on new developments through participation in professional societies, attendance at document workshops and professional readings.

§ 7–8

8. Space standards shall conform to ALA standards for type of library.

8–1 Space for the depository operation should be of the same quality as other areas of the library. It should be attractive, comfortable and have acceptable levels of lighting, temperature, ventilation and noise control. It should be functional, flexible and expansible.

8–2 The space should contain well planned areas for services provided, reference, circulation, loan and other public service activities as well as adequate space for the processing of new materials and housing of the collection.

8–3 It should include private work areas for staff members and the administrator.

8–4 All parts of the collection should be readily accessible, preferably open shelf, but in all circumstances, should be located so that materials may be retrieved in a reasonable period of time.

8–5 If documents are maintained in a separate division of the library, the space provided should be conveniently located to encourage use of the materials.

8–6 The library should abide by the recommended standards for handicapped users.

8–7 Tables and/or carrels should be provided for in-library use of documents.

8–8 Microform readers and reader/printers for the principal types of microforms should be provided.

8–9 Microform storage should be located in the documents area.

§ 8–10

9. Services to users requiring government information is the main objective of the depository system.

§ Reserved for new material

9–1 The depository will be open to the public for free use of depository publications.

9–2 In each depository library, there should be recognized focal points for inquiries about government publications. At this point it should be possible to find out:

a) Resources in the collection, including specific titles.

b) Location of wanted publications in the Library.

c) Answers to reference questions or a referral to a source or place where answers can be found.

d) Guidance on the use of the collection, including the principal available reference sources, catalogs, abstracts, indexes and other aids.

e) Availability of additional resources in the region.

f) Assistance in borrowing documents from a regional or other libraries.

g) User privileges for other libraries, educational agencies, culturally deprived, disadvantaged, handicapped, retired users and the community at large.

9–3 The library will have the option of establishing circulation policies for use of materials outside the library.

9–4 The library will provide facilities for using materials within the library, including copying facilities and equipment for reading microforms.

9–5 The library will publicize the depository collection through displays and announcements of significant new titles.

9–6 The library will provide to all users the same reference and research services offered to its normal clientele.

§ 9–7

10. Cooperation with the GPO.

10–1 Staff will familiarize themselves with the depository instructions and abide by their conditions.

10–2 Claims will be submitted within stated time limits.

10–3 Use correct address when corresponding with the GPO.

10–4 Promptly return all questions, surveys submitted by the Superintendent of Documents.

§10–5

11. Interlibrary Cooperation.

11–1 All depository libraries will be considered as part of a network of libraries consisting of selective, regional, and national. (See **Proposed Changes** 11.a, 11/7/74)

11–2 Selective depositories will cooperate in building up the collections of the regional depositories.

11–3 Selective depositories will cooperate with the redistribution of documents not needed in their own organizations.

11–4 All depository libraries will cooperate in reporting to the Superintendent of Documents new Federal documents not listed in the **Monthly Catalog.**

11–5 All depository libraries will cooperate in the development of tools for the identification and location of documents in other libraries.

11–6 Depository libraries borrowing documents from other libraries will verify bibliographic information as completely as possible.

11–7 All depository libraries will provide material on interlibrary loan at least for the regional depository. (See **Proposed Changes** 11.b, 11/7/74)

11–8 All depository libraries will provide a reasonable number of photocopies on request.

§11–9

12. Regional depository.

12–1 Eligibility to become a regional depository library.

a) There may be not more than two regional depositories in one state. A regional library may serve two or more states, or regional status may be shared by more than one library. (See **Proposed changes** 12.a–b, 11/7/74)

b) A regional library must be an existing depository.

c) A regional depository should be conveniently located to serve the largest number of people possible.

d) The library selected for regional status should have an adequate retrospective collection, space, personnel and a continuing basis of financial support sufficient to fulfill the obligations of a regional depository.

e) The selection of a regional depository should be agreed upon by the state library authority and all depository libraries within the region.

12–2 Obligations of regional libraries.

a) Receive and maintain permanently all Federal government publications in either printed or microform as provided in the depository instructions.

b) Attempt to complete their retrospective collections of major serials, annuals and other research materials by means of gift, exchange or purchase, including microforms.

c) Screen all lists of documents withdrawn from selective depositories to insure their future availability in the region.

d) Acquire additional copies where necessary.

e) Assist selective depositories with reference questions, interlibrary loans and photocopies.

f) Grant permission to selective depositories to dispose of unwanted documents according to the **Instructions to Depository Libraries.**

g) Provide guidelines to selective depositories for preparing disposal lists of unwanted documents.

h) Contribute to the effectiveness of the depository network through workshops, training sessions and consultive services within their region.

§12–3

Appendix A

Budget of the United States
Catalog of Federal Domestic Assistance
Census Bureau Catalog
Census of Housing (for State of Depository only)
Census of Population (for State of Depository only)
Code of Federal Regulations
Congressional Directory
Congressional District Data Book
Congressional Record
County-City Data Book
Federal Register
Monthly Catalog
Numerical Lists of Schedules of Volumes
Slip Laws (public)
Statistical Abstract
Statutes at Large
Subject Bibliographies
Supreme Court Reports
United States Code
United States Government Organization Manual
Weekly Compilation of Presidential Documents

Proposed Changes to the Minimum Standards and Guidelines for the Depository Library System Which Require Legislative and Administrative Action. (Numbers correspond to standards numbers.)

1. Distribution of Documents

a) The number of copies of GPO imprints purchased for distribution to depository libraries is equal to the

§ Reserved for new material

number of libraries which select that Item from the List of Classes . . . (44 U.S. Code 1903). Most regional depositories are large libraries serving large numbers of library users on-site as well as providing interlibrary loan service to selective depositories within the region. **It is recommended that regional depositories be entitled to a second copy, either in microform or paper copy, if desired.**

b) The cost of printing and binding of non-GPO publications is borne by the components responsible for their issuance (44 U.S. Code 1903). The Committee feels this restricts their availability to the depository program. **It is recommended that appropriations be provided to enable the Superintendent of Documents to obtain non-GPO government publications.**

c) The Superintendent of Documents is charged with the responsibility of investigating depositories. (44 U.S. Code 1909.) **It is recommended that the Superintendent of Documents should receive adequate funding to conduct an inspection program of depository libraries biennially.**

2. **Catalogs, bibliographies and indexes to U.S. Government Publications**

a) Bibliographic tools cited in Title 44 include a Comprehensive Index (44 U.S. Code 1710), a Consolidated Index to congressional publications (44 U.S. Code 1710), a Catalog of Government Publications (44 U.S. Code 1711), and a Classified List (44 U.S. Code 1904).

b) The comprehensive index referred to in section 1710 was the **Document Catalog** which ceased with the 1940 coverage, and to some extent was replaced by the reorganized **Monthly Catalog.** It is recommended that financial **support be given to the Superintendent of Documents to increase the coverage in the Monthly Catalog, improve the indexing, provide periodic cumulations and speed up publication, thereof.**

3. **Designation of Depository Libraries**

a) It is possible for a new depository to be designated by a Congressman or Senator without the knowledge of the regional depository, which may be in the best position to know if there is a need for an additional depository and where it should be located. **It is recommended that 44 U.S. Code 1905 include the words and head of the library authority of the state and the heads of the regional depositories, if any.**

b) The law specifies that a library must contain 10,000 books other than government publications to be a depository library. The Committee considers a library of this size to have insufficient resources to support a depository library. The term "book" is misleading, since it could indicate multiple copies of the same book. The Committee recommends 25,000 titles other than government publications as the basic minimum size to be eligible to become a depository library.

Collections

a) Appropriations may not be used to supply depository libraries documents, books, or other items not requested by them (44 U.S. Code 1913). This restriction tends to nullify the intent of the depository law which is to make government publications available to the public. The law implies needs beyond those of the individual institution which serves as the depository. For example, a law library occupying a depository designation may be interested in acquiring only legal materials. Library users in the area may need access to other materials, such as the Census.

b) The present law makes no requirements as to number or type of document selected by the individual depository. While recognizing that to receive all depository items would place an undue burden on the small library, the Committee believes that it is reasonable to require a depository to accept a minimum of the selections available to depositories. This would include a basic list, revised annually, recommended by the committee of depository librarians and additional titles selected by the depository to satisfy the needs of the community.

5–10. These standards refer to custody and serve for depository materials. They are covered in general terms in 44 U.S. Code 1909 and specifically in **Instructions to Depositories** (July 1, 1974).

11. **National System**

At present this system consists of selective depositories and regional depositories. *It is recommended that provision should be made for a National Depository Library at the head of the system.* In the January 22, 1974, report of the ALA Ad Hoc Committee on the Depository Library System, 8 of 9 recommendations refer to a National Depository Library.

12. **Regional Depositories**

a) Only 38 States are served by one or more regional depositories. Regional status is voluntary. Selective depositories not served by a regional depository are unable to discard unwanted documents, or to depend on a regional for reference questions, interlibrary loan, photoduplication or assistance in the organization of their collections. The Superintendent of Documents lacks the assistance of the regional librarian for information about conditions of local depositories or for participating in inspections and their followup.

b) To assure the regional depositories are better able to serve selective depositories, **it is recommended that limited financial support be sought to defray direct costs incurred by a regional depository for responsibilities beyond those of a selective depository.**

Number 12 GP 3.27:13

APPENDIX B

Reactions to:

Proposed Guidelines

for the

Depository Library System

Submitted by
Committee on Standards
Depository Library Council
to the Public Printer

Federal Documents Task Force
Government Documents Round Table (GODORT)
American Library Association
Rebekah Harleston, compiler

PREFACE

At the 1976 midwinter conference of the American Library Association, the Federal Documents Task Force of GODORT charged the Work Group on Depository Libraries to study the Proposed Standards and Guidelines to the Depository Library System submitted by the Committee on Standards of the Depository Library Council to the Public Printer.

Leroy Schwarzkopf, Coordinator, called for volunteers to study comments and suggestions submitted on the proposed 1)standards 2) guidelines 3) inspection. He announced that he would send letters of request for comments to some libraries chosen at random, some chosen particularly, and would ask in Dttp for any who would to send their reactions to the person who had volunteerd to study and compile the resulting information.

I volunteered to be responsible for the Proposed Guidelines. Fourteen persons replied with written analysis of their response and further suggestions. Some were brief outlines of one or two parts of particular concern to a particular library; others were quite detailed, covering a number of points specifically and elaborating upon a philosophy. These replies have been correlated with each other and with reactions given in personal interviews.

I must thank Mr. Paul Willis, Director of University of Kentucky Libraries, for making available copies of the report; Mrs. Susan Csaky, for her cooperation in making the time for this work available; to Dean Trivette, who has helped in many ways.

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The Superintendent of Documents has proposed to review and to revise guidelines and standards for the depository library system. Some are reinforcements of already existing stated goals. But, for the first time specific actions are named.

These specifics will be received with alarm by some; others will welcome a model by which to compare their present practices and to improve their control over the ever increasing material coming through the depository system.

Mr. Schwarzkopf has examined in detail the generalized purposes expressed in the Depository Law and in the "Instructions" to libraries in the system.* He has made comments and recommendations for amendments to that Act. His analysis of the Proposed Standards and Guidelines leads him to conclude that they have failed to come to terms with the problem. He has pointed out the limits of the law as contained in Title 44 and has shown what can and cannot be done; what changes would have to be made in the law to make the Guidelines conform to that law; what contradictions between and among the law, the regulations, and instructions now obtain. All these elements must be in conformity to make possible the fulfillment of these objectives as presently envisioned.

This paper will repeat Mr. Schwarkopf's conclusions only as they were reinforced by respondents to the request for librarian's comments on the law as presently written, on the instructions which bind the depositories, and on mimimum standards to be imposed.

A number of respondents suggested editorial changes that would make the documents easier to read and the relationship of statements easier to grasp. These could be effected quite simply without changing the

* see Appendix D, Analysis of Proposed Standards and Guidelines for Depository Libraries.

meaning of the Guidelines. Parallel construction is the best rule for clarity. For example, Sections 3-4, and 3-6 begin with the statement of the section; all other sections are declarative statements (with passive and active verbal construction perhaps making for initial confusion). In Section 10, 10-1 and 10-2 are declarative sentences, and 10-4 are commands. "The headings for Sections 8 and 9 are not consistent with either; 'Space Standards' and 'Services to Users' would be good headings, with the sentences now presently used as, or incorporated into, 8-1 and 9-1." At the very least, the headings should appear in all capitals, in some other distinctive type, and/or centered or separated by space from the text.

The objectives of the Depository Library System were well taken in principle by all respondents. The implementation of the program met with objections, suggestions. A more detailed statement of philosophy and practical application appear later.

*2-3 The Proposed Changes to the Proposed Guidelines recommends additional appropriations to the Superintendent of Documents for the acquisition of non-GPO government publications. These monies would allow for the incorporation of those documents that fall within the purview of the program, no matter their sponsoring agency or their format.

The "Proposed Changes" take cognizance of the dual responsibilities assumed by Regional Depositories--to render service to their own clientele and to provide loans to and reference service for other libraries in the region. The law presently stipulate that a depository may receive only one copy of each title. Point 2-9 suggests that more often than not, multiple copies should be available; the exception would be the choice of

* The numbers in the left margin correspond to the paragraph numbers in the Proposed Standards and Guidelines. (see Appendix A)

only one format. This statement at the very least is misleading and would have to be reworded. Better still, the recommended change should be accepted: "regional depositories be entitled to a second copy, either in microform or paper copy, if desired. If the second copies were micro-, the Regional could send that, or could provide fiche to fiche, film to film duplications to their selective depositories. Another suggested addition to change 1a:

> "It is recommended that sufficient copies be available after depository distribution to fill claims for publications missing from shipments"

was strongly mentioned by more than one librarian for himself and irate patrons.

2-4 This point raises the question: what does have reference value, and to whom? Statistical abstracts--general and subject oriented--, compilations of laws, bibliographic indexes and abstracts; there appears to be little quarrel with such a definition. It is beyond these types that lead to differences of opinion. Perhaps the term is too closely related to materials usually found in a reference room. The vagueness of the term was also a point of discussion of minimum standards.

If different guidelines and standards can be set for the different kinds of depositories, i.e., "Congressional" and "law" designations, some distinction could be made in what constitutes "reference."

2-5 There is some objection to the lack of annotations on notice of titles to be added to the system, or of samples of series. Some series titles are self explanatory. Some series are surveyed very early so that depositories may select the item in order to be eligible to receive the publications from their beginnings. As possible, titles of the first issue to be

available serve as a guide. These are the explanations that have been given from time to time.

2-6 The widened scope of materials available is pleasing to the respondents in selective depositories (regionals indicate that depository distribution of some titles in microformat would be an absolute necessity, and that in most cases they would make the choice of format.)

The guidelines as proposed suggest that item numbers be subdivided "as necessary to insure... only wanted documents". There is growing demand for closer narrowing of series if the intent is to be realized. Apparently the better idea is to have each series represented by its own item number. This would eliminate confusion, save time and space for libraries, and money for them and for the government. This one section was received with enthusiasm by every person replying. There seems to be a feeling that libraries can choose a single series from an item number carrying more than one: perhaps that could have been done when the system was smaller; it would appear to be too costly at present. As items are rationalized, the Washington office and agencies responsible for the publication should consult working librarians and others knowledgeable in the fields of study.

2-7 In addition to the information suggested, shipping lists should provide <u>at least</u> for:

1. Classes changed--earlier SuDoc classification numbers
2. Classes added--the assigned name of the agency and title of the series
3. Corrections:
    a) Old class as well as new (this used to be done)

b) Indication of

1) Changed classification of series

2) changed classification of specific publication

3) typographical error

2-8 The "claim form" makes no mention of claims for damaged, incomplete, or incorrectly collated documents. It presupposes that the librarian knows to get a copy of a missing shipment list to use in claiming a missing shipment. The italicized "false statement" antagonized some of these responding librarians. They felt that the guidelines and instructions clearly presented are sufficient notice of the policy of the depository system.

2-9 "Timely" is a word almost universally used in the discussion concerning catalogs, bibliographies and indexes. The feeling seems to be of long standing, agravated by the delayed appearance of the 1975 and 1976 issues of the Monthly Catalog. Title 44 demands bibliographic tools and certain types and periodicity. This irritation may have its rewards. Library patrons and document users of every ilk have been doubly impressed by the necessity for access to government information. The Freedom of Information

Act has reinforced the legal basis for production and the public's awareness of the tools and/or lack of them.

This is not to take away from the past or present catalogs. Nor is it intended to insist that retrospective ones be revised and enlarged. Some features could be restored to current indexes. Earlier issues of the Monthly Catalog had carried "Notes of General Interest." New government agencies were detailed: enabling legislation, functions, history, with change of structure or purpose, type of report. Granted that this information can be found elsewhere - it is later and scattered. The story of new periodicals tells the type of information, the audience to whom it is addressed. Policies and explanations of the Superintendant of Documents office were given as needed.

The Monthly Catalog is on OCLC as of July 1, and entries will be according to AACR. The catalog was at one time arranged by department, with its subagencies subsumed. To accomodate access to publications of a particular body, the index listed the name of the agency with sometimes identifying types, and all pages (later entry numbers). Later, the arrangement was alphabetical by agency. In the latter instance, a list of agencies represented in that month gave

understanding of the organizational structure of government. The new Monthly Catalog will give subject approaches directly, rather than in a separate index. This is a plus. In addition, there is to be an author, a title, subject index. Projected are stock number, classification number, series number, perhaps a separate corporate agency index.

The need for a thesaurus of terms has long been felt. Indexing and subject headings are not consistent from month to month, and less from year to year. The change to Library of Congress subject headings will not obviate the necessity for a dictionary that will list words that narrow and pinpoint ideas and facts. The list should also include "see" and "see also" references.

Commercial publishers have come to the forefront in indexing and abstracting government publications. Notable among current in-depth services are Congressional Index (CIS), American Statistics Index (ASI), Index to the Serial Set by Congressional Information Service, John Andriot's numerous indexes and guides, Greenwood Publishers services. These companies and others are either completely serving the documents user, or are devoting the major proportion of their energies to the field. A number of companies from time to time have indexed the JPRS series. There

is a numerical code index correlation with SuDoc numbers, brought up to date periodically. In addition, a correlation AD/PB index out-of-date index could be continued.

STAR, NSA (now ERA), are major index-abstract sources for information in their fields. Government Reports Announcements and Indexes (its latest name) indexes-abstracts materials in economic and social sciences and to lesser degrees, humanities, and lists and identifies abstracts found in the two preceding journals. Resources in Education covers a subject field perhaps wider than its title implies. Pressures of money and time have forced the cessation of some of these cumulations.

For several years there has been some thought given to uniting all these into one big catalog. This apparently is an attempt to meet the challenge for a comprehensive catalog. Most librarians speaking to the question throw up their hands in holy horror. What would be the sense in searching so many entries about so much of no import to the immediate user?

The indexes to these major services have cumulated quarterly, semi-annually. For some, and at some periods, the cumulative index was a separate purchase and not part of the subscription. The Monthly Catalog, which is a kind of continuation of the Documents

Catalog, a bi-annual catalog-index, has a ten-year 1941-1950, and a 1951-1960 cumulative index. The idea of a 1961-1970 cumulation was abandoned and a quinquennial is in preparation as of July, 1976.

If the Superintendent of Documents is to fulfill the obligations of his office, then the proposal "that financial support be given to increase the coverage in the Monthly Catalog, improve the indexing, provide periodic cumulations and speed up publication thereof" must be implemented.

2-11 The standard classification system for federal documents presumes to be that of the Superintendent of Documents. This system is established for those publications sent to the library and classified by them. It fails to catch those documents not received there (for whatever reason) but which fall within the defined types. It does not take into consideration any others of the literally millions of titles. So-called "Report literature" is caught only if the agency sends it to the library.

This classification versus non-classification poses two problems under one umbrella. First, would it overburden the "SuDoc" system to the breaking point? (Remember the old "PS" and the Public Health Service?) Then, if it is not cataloged by "the" standard, how could it be integrated into a combined catalog? The overriding question is whether it

needs to be, since references to reports almost always identify their own individual symbols. Apparently, working scientists demand direct access with no hierarchical structure standing in their way.

Some helpful related aids, such as a thesaurus, in addition to other advantages already named, could be kept current to reflect the changing times. The reform in the process of assigning individual items numbers for serials should automatically mean a survey of libraries. This will provide information for the entire system. Again at this point, there is the recommendation that the library consult with an advisory committee to insure that the classification meets the needs of libraries.

2-12 There was generally the feeling that the Library had been as helpful as could be expected with their limited staff in helping libraries to identify specific items, or to supply a class number for them for a document not held in their collections. Very lately, a new attitude on the part of the administration has antagonized even those not directly affected. That this is a service above and beyond the call of duty, and not properly their business is being rather hotly disputed. Librarians hope that increased staff, expanded space and uniform shelving will allow for more help than has been possible before.

2-13 Opinion is sharply divided concerning the establishment of a National Depository Library. There is general agreement concerning the necessity for a central library or archives to maintain a copy of all material passing through the system. The division becomes apparent in the concept of the role this institution might play.

Will it be a library giving technical help, reference service, interlibrary loans, compiling bibliographies? Will it be an archives holding the material in order?

If it sells photo copies of requested documents, the impact of the operation will be far reaching. The possibility of another source of supply, not at its own expense, can very easily influence agencies to reduce the number of copies printed, not increase as is now being positively pressured. If, as suggested, the National library could supply replacement copies to regionals, will this function undercut the sales program of the Government Printing Office?

The system of regionals was originated to serve as a network for the full range of activities with documents. The idea behind the dissipated reserves was one of more intimate contact and interest. The presence of a complete collection within easy physical reach (some comments will follow later) was thought to be a better arrangement than one collection physically accessible to a few. The Presidential libraries are a prime example of the philosophy of accessibility.

Thus the consensus--if the National library attempts to be all things to all people, it may perhaps be less than successful in its mission.

2-15,16,17 Almost to a person, those involved with the depository system as a system have welcomed an evolution and inspection process. They should be conceived as positive factors to encourage libraries to higher levels of achievement. Perhaps if the visits were called "consultations' they might better reach their goal of having depositories to conform to regulations and of providing advice and help to achieve the ideal.

As the interview progresses, the evaluator can and should note exceptions to standard procedures with the reasons for their being, with the possibility of changing or expanding ways of caring for the collections. He certainly should have time enough and opportunity to study responses from other libraries and to pass on good ideas that work. A library with a workable and well received program will certainly be willing to share information on it.

Again, the representative should send back to the library a written summary of the findings of the visit, together with any recommendations or suggestions that could upgrade a depository with a relatively low rating, and most certainly encourage the better ones to higher standards.

The suggested six months period is thought to be too short a time to correct inadequacies. This effort would almost surely entail more money and more staff to bring the library to standard. Perhaps this requirement might be changed to say that indications of improvement must be apparent during that period, and then probation continued for a further similar period before the library would be deleted from the list of depositories.

The Regional should receive a copy of the report on the depositories it is designed to supervise and to help. In the initial visit to the regional, there will obviously be discussion of its relationship with

other libraries. If this visit is made after some of the selective depositories have been seen, the comments can be helpful. At this point, constructive suggestions are possible. After the remaining libraries have been visited, further comparisons of effective relationship can make possible a valid judgment of the effectiveness of the regional. Certainly ideas gleaned from other states and other areas will be appreciated.

The questionnaires and surveys of the past have given libraries an opportunity to examine themselves. For those people who are self-motivated, they have served as a spur to better service. On a more mundane level, they have been used as a lever to move library administrators to action and to greater support of the depositories.

What becomes of the surveys and questionnaires when they are returned? Are they filed away and forgotten? Or are they read, studied to create a basis for rethinking the program as a whole as well as the institution replying? A comprehensive study based on the information gathered is long overdue. This is a government publication that would be welcomed.

The implementation of such an ambitious program is predicated on the provisions of additional funds. The financial stress just might bring an evaluation of the system and a refining of its compass.

2-18 Public Documents Highlights is the first significant step taken to present new policies and procedures. The series carries information of interest to all persons concerned with the use of documents. Its distinctive title makes it easily noticed, and it is available to the general public. The announcements in the shipping lists are another source of information of administrative interest for depositories only.

2-20 It is interesting to see how many of the proposed guidelines and suggested changes to them have been implemented since they were initially presented, and how effective the Council has been and is being.

2-19 The increased activity in the field of documents has been stimulated by the producer and the user; sometimes in reverse order. The same can be said for trade publications of and about official documents. Many of the agencies of the government are fully cooperating, with all that the word implies. They are anxious to allow commercial and/or associations to index, abstract, list, compile bibliographies, and take every opportunity to encourage such participation. In the recent past, the Executive, Legislative, Judicial armies of the government and many in independent agencies have presented their published materials to be filmed or to be reprinted. Thus it is that libaries recently established can provide an almost complete collection of retrospective series as well as of current or just out-of-print material. Declassified and otherwise unpublished documents are now open and available.

New companies are formed (sometimes it seems daily) and old companies have expanded their operations in the field of documents. Competition in the field is keen, and quality of product almost uniformly good.

Pressures of money, time, space of the Government Printing Office, its affiliates, and the multitudinous other agencies that publish and of various places that house the material are forcing the government into supplying some documents in microformat. This practice is causing some anxiety among the commercial firms which have staked their futures in the field and some friction has arisen. The two are not generally antagonists, but rather protagonists trying to come to a reasoned way of accomodating each other and the public.

2-21 The Library, considering the whole question of statistics, must weigh

the need for the figures, the ability of the library to utilize the information, the overlap with statistics compiled in other departments; i.e., reference, interlibrary loan. Specific kinds of statistics are discussed in detail in another study. There was no serious opposition to the premise; indeed, some pointed out that supporting statistics must be available if the depository system anticipates a National Depository Library. Statistics do bolster the position of a local depository as it seeks a better financial rating.

3-1 Serious attempts are being made to assess the quality of depositories. This is the time to look very closely at the library. Why is this library a government depository? Because earlier some administrators thought it was a great idea and nobody has reviewed the situation? Because a representative or a senator wanted to "point with pride" to what he had done for his constituents? Because he and the library are conscious of the prestige that is a holdover from the days when the Superintendent chose them and not the other way around? Review the reasons, then seriously consider discontinuance.

Is this library giving the service that satisfies its patrons? The quality of the collection in relation to the purpose of the specific library is of equal importance to its quality. Basic books must be supplemented by thoughtfully chosen added titles. If such a collection can not be maintained on a worthwhile plane, the library might better serve its community by relinquishing its depository status to another nearby institution.

The number and location of depositories must be reviewed, according to several of those responding to questioning. Some densely populated areas are served by several libaries; sparsely populated western states may have depositories separated by hundreds of miles. Rural areas also

are under represented. Where one Congressional district encompasses many counties, the inequities are compounded. Some limitations might be set to take into account geographic coverage. Some relatively small libraries might be willing to serve a wide area. Perhaps there could be a "split" regional depository, wherein reponsibility for certain types of material by subject or by issuing agency might be assumed by each entity of a group.

Only in this way does it seem possible to realize the goal of making documents "available to the people." This solution is proposed as frequently by those in congested areas as by those in the less populated regions.

3-2 One other question frequently arose. What of those institutions which have restrictions on the use of the facility? If the general public is not allowed free use of the library, then the conditions for a depository are not met and it would logically follow that depository status must be revoked. If the federal documents are integrated into the general collection, there is possibly a violation of the law. Some libraries have construed the law to include the entire library collection. The law affects federal documents only. If they are maintained in a separate collection, access to them could be arranged with a minimum disruption to the library's regular routine.

3-3 "Too vague" is the comment on 3-3. Some respondents think that minimum requirements for space, budget, for a given number of titles/ volumes should be given as an indication of the ideas of the Superintendent's minimum requirements.

Even with proposed changes, there is no consensus on the minimum size of the library. Special libraries might not need 10,000 titles excluding government publications, If, as suggested earlier, there is no larger library to serve a multi-county, perhaps a multi-state area,

is it not better to some rather than none?

3-5 Depositories must be allowed some discretion in assigning their hours of service. It is conceivable that the clientele would find other times more suitable for their needs and opportunities. The guidelines could indicate that variations are allowed.

3-7 Who makes known a vacancy in a Congressional district? The Superintendent of Documents, Senator or Representative, the state library authority, the regionally conceivably, could be aware of the vacancy, in that order. The professional association is probably the last to hear.

3-9 The logic of the guidelines concerning the discision to designate a new depository can not be faulted. On paper, this is fine. In actual practice, quite the contrary sometimes occurs. In one instance, the library head became aware of the new status through the newspapers. They were not consulted, or did the state authority have sufficient lead time to do a study on the real value.

Before depository status is confirmed, the requestor should present in writing (if possible also on personal interviews) the resources of money, space, and especially personnel proposed for the initial stage, and some realistic projections for the near future.

4-1 The basic reference collection proposed certainly places no restraint on any library that professes to give the public access to information about the government or by its agencies. In addition, perhaps other basic titles might be indicated for libraries with special interests or serving a particular public: education, welfare, health,law, sciences.

Earlier statements show that some librarians agree with the proposed guidelines if the government provide, as free depository material,

microformat if that best suits their need.

4-2 No one questions seriously that the depository should maintain some basic catalogs, guides, indexes generated by government agencies. A number of respondents consider it to be the responsibility of the depository system to provide any recommended trade publications to pay for all government titles available only in microform or in reprint formats.

Insufficient funds for purchase is the most frequent reason for the library's failures to provide their trade sources. None suggested that if the federal system absorbed all such costs for all libraries, something would have to go, and it might be libraries.

4-3,4 Here as elsewhere arises the philosophical and yet practical question: who is the library's public? Is a "law" library obligated to serve persons outside its confined interests? A "Congressional" library may be presumed to have as its public the people of the Congressional district.

Until and unless this dilemma is resolved, persistence in a "numbers game" will alienate and divide the documents community and its neighbors.

The suggestion that a library be required to select at least 25% of the available items on the Classified List meets almost unqualified opposition. One argument is that it places undue burden on the staff and facilities of smaller libraries. It provides more than "frequently used and potentially useful materials."

These sections seem contradictory, and inconsistent with statements on pages 7 and 11 of the Instructions to Depository Libraries, rev. July 1974:

> "You are urged to use your utmost discretion in selecting publications so that there will be no waste of Government funds and so that you can give proper custody of those you do select and make them readily available to your patrons."

All selections should be reviewed once a year to determine whether the library is receiving material which is not being used and to eliminate wasteful use of taxpayer's money and unnecessary costs to the Federal Government in supplying material which is not needed.

An arbitrary figure, be it number of titles, or any dictated percentage, subverts the purpose of the selective depository.

4-6 Can not the implementation of Section 6 be the instrument used to insure that the district is well served by its depositories? If the parent organizations agree, the various libraries can establish certain speheres of concern, organize the materials, and make them generally available to the cooperating bodies. Reference service on "as possible" basis can be given by phone and letter as well as in person.

This plan has worked very well in more than one urban area, and across Congressional boundaries in states where the libraries are not more a three hours' drive or as close as eighteen miles.

Organization of the Collection

5-2 Of all things, there is a great flap over the instruction to date publications with the date of the Shipping List. Especially, those with an integrated collection ask for an option of date of the Shipping List, date of receipt (date of process). Comments at the April meeting of the Council to the Public Printer reinforce the concern over this upsetting routine. DttP has also printed protests of some of the community. The Documents Highlights announced that in August 1975 the Superintendent of Documents had agreed to accept either one as meeting the requirements.

It is possible that this minor point that could be seen and dealt with as a "thing" and not an idea is settled and a solid feeling of accomplishment soothes the jangled nerves.

5-3 The requirement for a record of accessions seems to be a perfectly legitimate request. Certainly most libraries have control over their orders, and maintain records to show where the materials are located.

5-4 A shelf list is rather readily defined: it is a list of materials arranged in the order of its appearance on the shelf. Yet one library reports,

> A shelf list is not necessary for our particular operation. A file consisting of a card for each class we receive has proved sufficient for both accessioning and retrieval. Also, I think that the establishment and maintenance of a shelf-list record for every item received would place undue demands. . . .

Another "does not have a shelf list." Numbered series are checked in by title. "[No explanation of how these are arranged, nor types of records for other than numbered.] Others do not have a shelf list. . .operate with efficiency and provide in-depth service to their patrons."

Some contrue the regulation to require a separate card for each publication received, and to disallow forms designed for checking numbered, serial or annual.

5-6 The recommendation is unfair to those libraries using a system other than Superintendent of Documents. One respondent wondered if the SuDoc number is used that much. It demands a duplicate record, some say. Documents in an integrated collection can be retrieved by the main entry in the public card catalog. This card carries the documents symbol for cross-verification.

The official Library can clarify the recommendations and perhaps give examples of how to meet with the least amount of disruption.

In strictly unofficial conversations here and there, a solution is offered. If an entire

series is cataloged, the information can be recorded in either of two ways which would fulfill the requirement. One way has been showed in the discussion above. The other is a "round-about." The classification numbers [at the very least; the addition of the main entry adds to its effectiveness] or the routing of unclassified documents can be entered on the Item card. The bulk of serials already classified can very easily choke the system. Because the Library of Congress catalogs relatively few monographs, and those not always timely, original cataloging is frequently the rule. Here certainly, double records will be necessary to assure immediate retrieval of a document in the cataloging process.

This requirement can also impose a burden on a small staff, one that does all of its own processing and typing of cards.

Again, some have assumed that if the depository boxes have been opened and any claims necessary made, the items can be arranged in order and in a sense are "processed" and can be accessed.

Some compromise will have to be reached between the demand for completed cataloging and the reality of temporary records that will provide accessibility.

5-7 The stipulation that documents be available to the public ten days from receipt is called impossible by those libraries which fully catalog and classify

documents in an integrated collection. To meet this requirements, all depository documents would have to be marked "priority," "rush."

The Superintendent of Documents must set the standard for statistical count of the publications passing through the depository system. The American Library Association has had more than one method of requesting statistics - monograph, periodical (variously defined as a title appearing in a frequency pattern up to semi-annual), serial (title appearing on a frequency pattern from semi-annual); or irregular.

At times, individual issues of a "periodical" were not to be counted; the completed volume then is one (1) added to the collection. The American Association of Law Libraries counts the individual pieces as added to the collection.

Material which is later cumulated presents another problem. Is it counted as it arrives, and later counted as withdrawn? Are changes to be inserted counted at all? Handling all this material involves time and resources, yet the numbers do not appear in the final statistics of documents added to the collection.

The library must keep a list of "pieces handled" to help to justify a request for more of everything.

Maintenance of the Collection

Financial considerations, perhaps more than any other single factor, determine the physical conditions housing the collection and the staffing devoted to government publications. Library buildings can be rearranged only so far, and the number and quality of staff can not always keep pace with the need.

Not even in the sixties, during the growth of colleges and the frantic building of buildings, could the ideal of space and lighting and layout be achieved.

The interest in documents is of fairly recent vintage, and persons thoroughly trained in the intricacies of third forms and sequences and bibliographical control are not so numerous.

6-1 Very frequently, the binding budget of a library is one of the first items to be cut. Administrations rationalize, "The material is here, it is on the shelf, it is available." Never mind that binding makes it easier to shelve, to use, less likely to disappear.

Buckram and vinyl binding is not the best answer to all the documents. Titles kept up to date by change and addenda pages require notebooks or binders for ease of processing. Cardboard pamphlet binders

serve to make easier shelving of titles frequently revised.

Some commercial publishers provide binders - at a price - for loose leaf services or monthly/quarterly publications which are later cumulated into final bound volumes.

All these are increasingly expensive to maintain.

These and other factors have their impact on the quality of maintenance of the collection. Individual institutions tend to set their own priorities. If depository collections are to be kept according to a standard set by the Superintendent of Documents, some kind of financial support should be accorded to depository libraries.

6-4 If a title can not be immediately located, a record must be made. At least three (3) follow-up searches - preferably not always by the same person - should be made for the missing piece. Then make every effort to replace it. If it is in print, replacement should be obligatory. Reprints and micro-reproductions are available for most of the historically important and heavily used serials. Individual titles can be bought in some format. Again, replacement should be at the discretion of the library.

Replacement copies are considered "depository" and are to be treated as such.

6-5 Mechanisms for making available to other libraries unneeded publications are the stumbling block. Documents people are usually more than anxious to pass on their publications to another library where they may be on the "want list."

6-6 The five-year retention period caused little comment. Presumably

because such a large numbers of depositories have been established in the 1960's and 1970's, and there was no minimum number of items required to be selected, the situation has not reached "crisis" proportions in many libraries. However, one librarian speaks hotly about "retaining all hard copy forever and ever, unless replaced by microfilm or microfiche. So many of the items are of ephemeral interest, and sheer bulk prohibits such a system anyway. I think this is the purpose of the Regionals..they supposedly have a copy of everything they have received since they started as Regionals. With all our wonderful systems of ILL and shared resources, it should be possible for anyone to get a copy of wanted material. I can't see the point of little libraries all over having to retain hard copy. Many of them cannot afford such luxuries as Microprint editions. Also..many of the items are printed on such poor paper, and are so poorly turned out that they would never hold up for a long time anyway."

I believe that this person is misunderstanding something somewhere.

Staffing

7-3 "A capable individual could assume liaison responsibilities after a probationary period of less than a year, even without graduate library training. This guideline smacks of credentialism"

"Two years experience is not necessary for this function."

"...trained librarians with a knowledge of American politics and government...Unless a qualified person is in charge of the collection and servicing it, then adequate service is not really being provided." But what of medicine and health, physical and chemical sciences, and all of the myriad other subjects found in documents?

Perhaps the difference of opinion arises from the multiplicies of activities involved. If the recommendation were so arranged as to group together mechanical tasks and "intellectual" interpretation, it would make clearer the documents complex.

This schematic design will tend to have a greater impression and administration, and make it more amenable to increased support.

Fot it seems self-evident that outstanding-indeed, even effective service is possible only with staff well-grounded in a multitude of interests.

7-4 The liaison person in a separate collection can very readily and very obviously be directly responsible to the administrative level of the library.

Placing a Documents Division under a Reference Department which may be under Public Service often adds back-up and staffing in non-peak hours, and extended hours.

In an integrated, or partially integrated collection, all or some of

the documents are processed in the Acquisitions and Catalog Departments.

In such situations, separate records of documents activities may be kept, collated by the liaison-person, and submitted directly to the administration, Some libraries which integrate their collection may not maintain separate statistics on acquisitions, cataloging, reference, circulation, but count them as a part of the libraries as a whole. Still, one person does maintain control of the functions named in acquisitions and cataloging.

The type of library, the numbers and kinds of items selected, the kinds of service required all have their influence in determining the ideal for a given library.

7-5,6 The proposed ratio of professional to support staff is a helpful figure to present to administration. Of equal value is a standard by which each department can rate its own performance in terms of quality of work. One can extrapolate a rating of quality of work that can be expected.

These figures are open to discussion. A separate documents collection can say that it does or does not meet the guideline. Compliance in an integrated collection is less easily determined.

7-7 The workshops for Regional librarians held in connection with A.L.A. are a forward step. If they could be held before Saturday (most of the documents activities are finished Thursday) they might attract some who can not stay the extra time.

State professional organizations encourage learning sessions at their annual meetings, and preconference meetings as well. Some library schools are awarding Continuing Education Units (CEU) points for participation

in recognized work-shops.

Administrative bodies vary widely in their cooperation with their staff. Professional leave at full pay is one option. Payment of registration fees a further. Purchase of study materials to be used in a workshop. Partial reimbursement of travel funds, of lodging, of food. Any, or combinations, or all of these financial helps may be available.

Such monies may be more forthcoming for "professional" rather than for "support" staff, even though the latter may have major responsibilities.

Space Standards

The ideal described in Section 8 is the dream of administrator, of every librarian, of every patron. What can be done is to study the guidelines and implement as many suggestions as are possible.

The building is what it is, and complete renovation, additions, new facilities are hard to come by. True, a little imagination, a lot of ingenuity, a strong back can work small miracles. The best the documents librarian in a separate collection can do is to seek equal treatment.

8-4 There are arguments pro and con for open shelf service for a collection of great size, whether it be arranged by Superintendent of Documents Classification or any other system.

No library can financially afford to bind in hard copy all its document holdings. Several pieces in a numbered series can be bound into a single volume. Along come revisions, and they must stand alone. Periodicals

can be bound when a volume is complete. Several years of the annual report of an agency can be under one cover. But what of the thousands of monographic titles received each year? The best most libraries can hope to afford is to put in hard cover significant studies.

Because a greater majority of documents are "paper" than trade publications, these present more housekeeping problems. Reference (back to that question again) and frequently used materials certainly belong on open shelves in an area comfortable and convenient, with staff members near at hand to give help and advice.

In a separate documents collection, most of it can be in "controlled" stacks. Then depending upon the given situation, staff member (or page) can bring the requested title to the patron. If the person needs to use a long run of a series, or to browse in a given area, he can do so.

8-9 In some libraries microforms, their equipment, and service have a central location. There is a good case for this practice "until clear indications such as the size of the documents microforms holdings and/or the traffic in documents in microform justify diverting equipment and staff to an ancillary area." There is the argument on the other hand that the vagaries of documents physical forms and bibliographical control are best served by one familiar with them.

Services to Users

The renewed emphasis on the necessity that the depository be open to the general public for free use of depository publications is posing some

problems for libraries in private institutions, academic and research.

The library with a separate collection can more easily conform to this major requirement for obtaining and retaining depository status.

9-2 As with other guidelines, 9-2 presents a dilemma managing the integrated collection. Perhaps because many of the questions suggested here are traditionally answered by the reference department, many documents collections are a part of that department. Particularly a,c,d,e,f within the compass of that area. A general Information Desk, centrally located, very frequently can take care of questions not requiring detailed knowledge.

9-3 Some have in the past interpreted the instructions to depositories to mean that all depository materials must be circulated. It is good that the guidelines spell out the option open to the library.

9-4 If the depository has microforms furnished by the Depository, and none substituted for original depository materials, is it then required that they furnish copying facilities for reproducing documents in microform purchased from commercial producers?

Cooperation With the GPO

10-2 The extended time of 15 days is a wise revision of the instructions. This dramatically increased numbers of documents available has strained the resources of depositories. The size of the collection is not the only factor that poses difficulties; libraries with small collections generally have a small staff. All things are relative.

Claim forms are to be used only for reporting publications not received, incomplete, incorrectly collated, or damaged.

Depositories can lose their status if they are consistently reported negligent in their relationships with the Superintendent of Documents.

Interlibrary Cooperation

A National Depository Library does not exist. The collection pulled together from the Library of the Superintendent of Documents and that of the National Archives is an approximation. Divided opinion as to what its function should be has precluded final decisions. Presently, it will sell electro-static copies or micro-reproductions of the non-copyrighted items held.

Regional libraries stand as the most likely source of help to selective depositories under their responsibility, and to other regionals.

11-2,3 Mechanisms for implementing guidelines 2 and 3 are almost too cumbersome to be widely used. The staff time required to weed the collection of unwanted items (and who has figured a way to tag in advance monographs that will obviously be discarded, or duplicated copies that will be needed no longer than the five-year period?) takes an inordinate share of the documents operation.

The instruction that says full identification must be given intimidates the giver. If call number, or title, or serial title only could be used, compiling the list might be a more realistic undertaking.

Duplicating lists to be sent to all depositories in the state, and perhaps to other Regionals is an expense. Which library bears the brunt of

such an intrusion on its operating budget? Which library notifies the Superintendent of Documents?

The instructions are not clearly stated, and should be reworded.

Could the Regional serve as a central clearinghouse for "want lists"? This could serve that area only, or such lists might be sent to all Regionals. This still does not solve the problem of what to do with weeded documents until a reasonable time for them has elapsed.

11-4 How great a time lag is reasonable before a library reports to the Superintendent of Documents new Federal publications not listed in the Monthly Catalog?

If the library makes such a report, gives what bibliographical information, photographs, the cover, gives pagination, can it then ask that a number assigned for that publication immediately? The source of acquisition can also be told, to help the official library more easily trace a copy for itself.

11-5 The meaning of this guideline is not clear. Does it make known its own holdings? How can it provide tools to identify the holdings of another library? A commercial publisher has offered for sale a union catalog of depository libraries and the items selected by them. Within the region, libraries can agree to collect in certain subject areas, or are known to be particularly strong in some field, and their collection can be tapped.

The "Item Book" in the library of the Superintendent of Documents is being computerized. Some thought has been given to making this available as a depository item itself on fiche. If this is done, it can be

kept up to date. If a printed copy is the form, it could be revised periodically and the Regional be responsible in the interim.

Some Regionals do ask the libraries to send copies of their selections, and make a composite list. The Instructions be read to mean that selective libraries are to send to the Regional, from each survey, a list of items not selected and to await permission to discard any samples received. If the list can be positive, the machinery is almost set up.

11-7 This unqualified statement of loan policies is in direct contrast to Section 9-3, which says that libraries have the option of setting their own policies for use of materials outside the library.

Most libraries do not lend "reference materials"--bibliographies, dictionaries, compilations of statistics, statutes or codes of laws, bound periodicals. If materials such as these can be excluded, then the policy sounds reasonable.

11-8 "The intent and extent" is unclear. Does this mean in lieu of interlibrary loan? If it means for individuals, it could place an undue burden on the library. Sad to say, this privilege can be abused and the possibility of an unrestricted flow of free materials to be added to one's personal library set temptations in the way of the bibliophile, of the serious researcher, and of the lazy.

This unfunded expense devolving upon a library, contrary to its financial responsibility to make its copy service self-supporting, must in some way be controlled.

The library should be able to make the same charges for photocopies of government publications as it does for other photocopies provided in interlibrary loan and personal requests made at this library, but also serves as a guideline for depositories.

Regional Depository

12-1 The problems of accessibility to documents collections in the West have been explored earlier. North Dakota has a split regional in an effort to alleviate the situation there. The stress on regionals in densely populated areas has drawn less attention. New York, with 72 depositories has one regional. A number of years ago, librarians discussed the necessity for, at the least one in the New York City area and one in the northern part of the state.

California has 96 libraries. Distances between some of these libraries and their regionals are greater than the distances between some libraries with fewer people. It is unrealistic to expect one library to perform for 95 all the functions required of a Regional.

Other inequities can be shown. And other situations. Hawaii, thousands of miles away from other states, has no Regional to absorb the collections that should be available, but can't be. One library was established in 1907, another in 1929. The others date from the 1960's. It is reasonable to require that a Regional must be an existing depository with an adequate retrospective collection, space, continuing basis of financial support. But if no library in the state with the collections and the space is willing to assume responsibility and some lesser books and space will agree to do the best it can with what it has, then that depository should be designated a Regional. Then with the help of selective depositories, its collection could be improved. With the Regional status established, the administration then could increase financial support to obtain materials generally considered too basic. The nature and extent of these can very well vary from one region to another.

The Regional system will not solve all problems and can not be all things to all people. But the library that proposes to offer its facilities, space, time, staff should be agreed upon by the state library authority and by the selective depositories involved.

The Guidelines makes no mention of a recommendation from the Senator or Representative in whose district the depository is situated, but this has been a requirement.

12-2 The proposed extended micropublishing of materials for depositories will serve to alleviate strictures of money, space, time, staff. Because selective depositories can not discard and/or replace materials, the Regional may be able to acquire in hard copy vital documents which they can utilize in that form, and/or have duplicated copies.

The requirement that the Regional attempt to complete its retrospective collections must have some teeth. An administration accepting the responsibility of a Regional must be encouraged rather strongly to meet its obligations.

Regionals may be perfectly willing and able to conduct workshops and training sessions for libraries within their region, but if the libraries that need such services the most do not seek such services, nor respond to offers nor attend sessions held, there is nothing that the Regional can do. So with consultative services.

Some selective depositories do not respond to correspondence from the Regional, do not submit notice of amended selections, do not correspond nor cooperate with other libraries within the regon.

Too often it is the libraries that are well organized, with good collections and interested and alert staff that attend workshops, make suggestions, seek help.

The personal inspection can have a positive effect in this area. The representative should insist that the selective depositories respond to requests for help from them, and of offers of help to them. Repeated delinquencies on the part of the selective can be as disastrous as failure of the Regional to do its share.

In truth, the requirement that a Regional serve as a clearinghouse for screening withdrawn documents and the official directive to insure availability of depository materials in the region is the thing that is new in the system.

Most depository librarians have extended courtesies to each, have met at professional organizations to discuss their mutual interests and to offer solutions to problems, have told each other of older documents to be acquired free, or at minimum cost.

12-3 There is little disagreement concerning the requirement for selected basic titles. Those suggested were for the most part accepted. Some insist that the final issues of the Congressional Record, Federal Register, Weekly Compilation of Presidential Documents be available in microformat on deposit, with hard copy indexes.

Most respondents agree that beyond those titles, there might be others just as necessary for a library serving primarily a particular field in law, medicine, health, general public. They want a long and detailed list of "must" no more than they want to be compelled to choose a given percentage of all offerings.

Summary

Depository status is indeed a privilege. It allows an institution to have a collection of materials covering the range of human activities, varying in their appeal from casual interest to definitive research. All this with a minimum amount of effort, time, and money. What library could attempt to purchase all the thousands of pieces that flow through the system?

Respondents uniformly praise the philosophy of the depository system. They are glad to receive so many exciting and stimulating publications of use to faculty, staff, public. They are enthusiastic about this useful and worthwhile material.

They are concerned that government publications be made available to the widest possible audience. Thus constant refrain that some provision be made for Regionals where they are needed, even if such a need may exceed the now limited two per state, or emcompass more than one state, or even have geographic distribution rather than state boundaries as the foundation of the system.

The guidelines should be restudied and re-aligned. There is no distinction between minimum and maximum requirements; between the ideal and the practical. While a required list of titles and a percentage of series available to depositories may be made mandatory, some of the standards seem to be beyond the reach of any except the most richly endowed. What is the limit of number of staff to serve the collection? Perhaps a minimum staff for technical processing can be postulated, but interpretation of the collection and

reference and bibliographic service and searches can not be determined by numbers alone.

"Some consideration should be given to making the standards either uniformily minimal so that a depository's performance can be measured by the extent to which it exceeds the minimum or uniformily maximal so that evaluation is based on the degree to which a depository approaches the ideal."

If the inspection program is to satisfy one of stated functions, some quantitative system should be devised that will make possible an objective, as well as subjective, evaluation of a depository.

As might be expected, an over riding theme is the demand for financial assistance for the depository libraries. The need was expressed at every turn, and there seems little reason to belabor the point here.

The charge from the Council was for suggestions for change in the Proposed Guidelines. Let it be noted that negative reactions are in the minority. A cursory examination of the responses shows that higher standards are suggested, not lower.

And so this report ends on an optimistic note.

Government Depository Libraries

State	Total Number of Depository Libraries	Dates of Establishment		
		Regional	Nos. Established 1960's	1970's
Alabama	24	1860	10	1
Arizona	10	1907	3	2
Arkansas	14	NONE	5	1
California	96	1895	49	17
Canal Zone	1	None	1	NONE
Colorado	20	1879	6	3
Connecticut	18	UNKNOWN	3	4
Delaware	7	NONE	2	2
District of Columbia	27	NONE	10	6
Florida	33	1907	11	11
Georgia	24	NONE	4	4
Guam	1	NONE	1	NONE
Hawaii	11	NONE	8	1
Idaho	9	1907	1	2
Illinois	46	UNKNOWN	17	8
Indiana	30	Unknown	12	1
Iowa	19	1884	3	5
Kansas	16	NONE	6	6
Kentucky	20	1907	4	4
Louisiana	22	1907	9	1
Maine	11	1907	3	1
Maryland	20	1925	7	3
Massachusetts	29	1859	9	4
Michigan	45	1868 UNKNOWN	20	7
Minnesota	21	1907	5	3
Mississippi	10	NONE	3	1
Missouri	26	NONE	8	3
Montana	7	1909	1	1
Nebraska	12	1972	2	2
Nevada	6	1909	NONE	3
New Hampshire	9	NONE	2	3
New Jersey	36	1906	17	6
New Mexico	10	1896 1960	3	3
New York	72	UNKNOWN	27	9
North Carolina	32	1884	12	7
North Dakota	10	1907	3	1
Ohio	51	UNKNOWN	16	9
Oklahoma	19	1893	3	3
Oregon	15	1963	6	1
Pennsylvania	53	UNKNOWN	22	9
Puerto Rico	3	NONE	1	NONE
Rhode Island	9	NONE	4	NONE
South Carolina	18	NONE	10	2
South Dakoa	10	NONE	4	1
Tennessee	23	NONE	5	7

Texas	55	UNKNOWN	25	20
Utah	11	1935		
Vermont	8	1907	4	3
Virgin Islands	3	NONE	3	NONE
Virginia	31	NONE	1	2
Washington	16	1910	9	9
West Virginia	13	UNKNOWN	6	1
Wisconsin	28	1907	2	2
Wyoming	7	1870	12	2
TOTAL	1160	UNKNOWN	4	0
			424	207

APPENDIX C

UNITED STATES GOVERNMENT PRINTING OFFICE
Assistant Public Printer
Superintendent of Documents
WASHINGTON, D.C. 20402

March 22, 1976

Mr. LeRoy Schwartzkopf
Federal Documents Task Force Coordinator
The Library
University of Maryland
College Park, Maryland 20742

Dear Mr. Schwartzkopf:

The members of the Depository Library Council to the Public Printer have drafted the enclosed "Standards and Guidelines" for potential use in the operation of the Depository Library Program. On a provisional basis, through 1976, the Depository Library Inspectors are being requested to use them as a guide and to help evaluate their effectiveness and applicability.

Copies have been distributed to 1,186 Depository Libraries in the program. The thoughtful criticism of Depository libraries throughout the United States is being solicited. In the light of these criticisms, and feedback from the inspection program, the Council will prepare a final version which will be recommended for incorporation by the Public Printer into the Depository Library Program.

Your office is also being asked to provide a review and formal comment on the "Proposed Standards and Guidelines." Any insight you can provide in evaluating their effectiveness, applicability or need for change will be much appreciated by members of the Council and this office.

Please direct your reply to this office before September 1, 1976, if at all possible. If you have any questions or require any further information, feel free to write me.

Sincerely yours,

J. D. LIVSEY
Director, Library and
Statutory Distribution Service

Enclosures

APPENDIX D

Analysis of Proposed Standards and Guidelines for Depository Libraries; with comments and recommendations for amendment of the Depository Library Act

by
LeRoy C. Schwarzkopf
Government Documents Librarian, University of Maryland
March 22, 1976

A major deficiency of the proposed standards and guidelines for depository libraries is a failure to distinguish between the legal requirements for the two types of depository libraries established by the Depository Library Act: (1) "congressional" designations, and (2) "law" designations. All provisions of the proposal are apparently intended to apply to the first group of depositories. With respect to the second group ("law" designations) some of its provisions are legally applicable to one or more sub-groups, but not the other sub-group(s). My analysis also indicates that certain parts of the Act require clarification to insure that the legislative intent, or spirit of the law is expressed in the letter of the law.

The Depository Library Act (chapter 19, Title 44, U.S. Code, hereafter called the "Act") establishes two main groups of depository libraries. I will call the first group "congressional" designations although this term is not used in the Act. It includes those "libraries designated by Senators, Representatives, and the Resident Commissioner from Puerto Rico, by the Commissioner of the District of Columbia, and by the Governors of Guam, American Samoa, and the Virgin Islands respectively". (sections 1905, and 1909) The second group, or "law" designations (the term is used in the Act) includes five main sub-groups and several sub-sub-groups as follows:

1. State libraries (section 1903)
2. Highest State appellate court libraries (section 1915)
3. Land-grant colleges (section 1906)
4. Federal libraries (section 1907)
   a. Executive department libraries
   b. Service academy libraries
   c. Independent agencies
   d. Subordinate major bureaus or divisions of executive departments
   e. Subordinate major bureaus or divisions of independent agencies
5. Special designations
   a. American Antiquarian Society (section 1908)
   b. District of Columbia Public Library (not mentioned in the Act, but listed in the JCP Committee Print, Government Depository Libraries as authorized by Statutes at Large, Volume 57, part 1, section 243)

An analysis of the statutory authority for the "law" designations indicates that the Act requires clarification in several cases. First the statutory authority for designation of "State libraries" is not clear. "State libraries" are mentioned only once in the Act, namely in section 1903 dealing with "distribution of publications to depositories":

> Upon request of the Superintendent of Documents, components of the Government ordering the printing of publications shall either increase or decrease the number of copies of publications furnished

for distribution to designated depositories and State libraries so that the number of copies ... is equal to the number of libraries on the list. ... Copies of publications furnished the Superintendent of Documents for distribution to designated depository libraries shall include- ..."

Section 1903 first mentions "designated depositories and State libraries" which may be interpreted to indicate the "State libraries" are a separate category from "designated depositories". It next mentions "libraries" only, and then mentions "designated depositories" again but fails to add "State libraries" as previously. The legislative history of the depository library program certainly indicates that "State libraries" are depositories designated by law. This matter should be clarified by adding a separate section similar to section 1906 which states that "land-grant colleges are constituted depositories to receive publications subject to the depository laws". This new section should also clarify another matter which is apparently understood but not specifically stated: i.e. this "law" designation is limited to one "State library" per state. The JCP committee print of April 1975 lists 77 depositories which could qualify as "State libraries", including 10 highest State appellate court libraries. Thirteen states have two state libraries each as designated depositories; and Wisconsin and North Dakota have three each indicating the wide variety in organization among the statesfor state library services. In North Dakota, for example, the State Law Library has used the "law" designation. This library also qualifies for a designation under section 1915 as the "highest State appellate court library". It could vacate its present "State library" designation, which could then be assumed by either the State Library Commission Library which had to use a Senatorial designation, or by the State Historical Society Library which used a Representative designation.

Section 1907 which authorizes designation of federal libraries of the executive branch and independent agencies has been violated by the designation of six Circuit Court of Appeals libraries from the Judicial Branch. The Act has been broadly interpreted to consider the Circuit Courts as "independent agencies". Section 1907 should be amended to provide for designation of libraries of the Judicial Branch, and also the Congressional Branch of the federal government. At present there are no depositories designated from the Congressional Branch. The Library of Congress obtains U.S. government publications under a separate section of Title 44 (section 1718). Such an amendment would allow the General Accounting Office, for example, to gain depository status.

The special legislation which designates the Public Library of the District of Columbia should be repealed, and either incorporated into the Depository Library Act as a special designation, or the Commissioner of the District of Columbia should use his one vacancy for such a designation. I will discuss other changes needed in the Depository Library Act in my analysis below of the proposed standards and guidelines. I will follow the order of the document, and will key my remarks to the specific paragraph number and sections therein.

PROPOSED OBJECTIVE

The proposed objective tries to conform to the provisions of the Depository Library Act. However, an analysis of the Act indicates a need for clarification, and a specific statement of the purpose(s) of the Act which it now lacks. One must infer the objectives of the Act from sections 1901, 1902, 1909, and 1911. For now, an authoritative (though deficient for reasons indicated below) statement of the objectives of the Act will be found in Senate Report 87-1587 on H.R.8141, 87th Congress which was subsequently passed as P.L. 87-579, the Depository Library Act of 1962.

> "The depository library system is a long-established cooperative program between the Federal Government and designated major libraries throughout the United States under which certain classes of Government publications are supplied free of cost to those libraries for the purpose of making such publications more readily accessible to the American public". (p.1)

Sections 1901 and 1902 prescribe the types of U.S. government publications which shall be distributed to depositories: i.e. "informational matter"; have "public interest or educational value"; and for "public information". It also prescribes those publications not to be distributed: i.e. "official use only or for strictly administrative or operational purposes", or "classified for reasons of national security".

Section 1909 states that a depository should be "located in an area where it can best serve the public need". However, a further reading of the sentence indicates that it applies to "congressional" designations only. Another aspect which is overlooked is that section 1909 includes the authority of the Superintendent of Document to conduct inspections, the Biennial Survey, and the requirement for a library to contain 10,000 books and "be accessible to the public". By making a strict interpretation of the letter of the law, one could logically conclude that these requirements and objectives apply only to "congressional" designations and not to "law" designations.

Section 1911 is usually considered to state the objective of the Act; i.e. "depository libraries shall make Government publications available for the free use of the public". However, on reading the complete sentence one may logically have doubts that this statement applies to all categories of "law" designations. The remainder of the sentence reads: "... and may dispose of them after retention for five years under section 1912 of this title, if the depository library is served by a regional depository". Indeed, the language of section 1915 specifically excludes the highest State appellate court libraries from all provisions of section 1911. Section 1907 excludes federal libraries from the major provisions of section 1911: i.e. "Depository libraries within the executive departments and independent agencies may dispose of unwanted Government publications after first offering them to the Library of Congress and the Archivist of the United States". One might then logically ask if federal libraries are also excluded from the "free use" requirement of section 1911.

This leaves those libraries which may be served by a regional depository. This includes all but a few "congressional" designations: i.e. all states and Puerto Rico, but not the District of Columbia, Guam,

American Samoa, or the Virgin Islands. However, it also leaves several categories of "law" designations which might be served by a regional, some of which are indeed themselves regional depositories: i.e. state libraries and land grant colleges. Finally, of the two special designations, the American Antiquarian Society is located in a state which is authorized regional depositories, while the D.C. Public Library is not.

Thus, the Act needs clarification of its objectives and purpose. These should be incorporated into the Act, preferably in an introductory section. What we generally consider to be the objective of the Act as stated in section 1911 and Senate Report 87-1587 applies primarily to "congressional" designations, and to a major extent to two groups of "law" designations: state libraries and land grant colleges. What then are the objectives for designating federal libraries as depositories? The legislative intent as gleaned from the hearings on the Depository Library Act of 1962 indicates it was to serve their own agency personnel, and not the general public. What is the objective for designating the highest State appellate court libraries if they are exempt from section 1911? What is the objective of the two special designations? Are state libraries and land grant colleges required to serve a geographic area?

Minimum Standards

Paragraph 2. This section should be deleted. It applies to chapter 17, Title 44, U.S. Code and not to chapter 19. It if remains, the wording should be revised to conform to legal requirements. The Superintendent of Documents is requiredto prepare a "comprehensive index" and not a "comprehensive system of catalogs, bibliographies and indexes". One might interpret a "comprehensive system" as including, for example, the CIS Index and Congressional Index and other commercially prepared materials which supplement the "comprehensive index". The comprehensiveness of the index refers to a complete bibliographic listing of all federal documents, and not to the depth of indexing and abstracting. Basic bibliographic data for each entry should satisfy the minimum legal requirement.

Paragraph 3. A "selective" depository may be either a "congressional" or a "law" designation. This paragraph refers to section 1909 which applies only to "congressional" designations.

Paragraph 4. This paragraph also arises from section 1909 which requires only "congressional" designations to serve a geographic area and "best serve the public need". The words "promote their use by the general public" should be deleted. This is not specifically stated in the Act, but may be included in the guidelines as something desireable.

Paragraph 9. This paragraph arises from section 1911 and its statement "for the free use of the general public". As noted above, highest State appellate court libraries are specifically exempt from section 1911, and by inference another major group of "law" designations are also exempt; i.e. federal libraries. The first use of the word "depository" needs an explanation. The intent of the proposal should be that those parts of the library which house depository publications will be open, or a service point will be open in the library where they may be obtained. I don't interpret the Act as requiring a library with depository status to open all its holdings and services to the general public. Many private colleges (and some public colleges as well) limit access to the public for reasons of

security, or to restrict use to persons who are authorized users of the library in general (i.e. students, staff, and faculty). If entrance to the library is physically restricted, a depository library should be required to post a notice that the general public may use its collection of depository publications and state the conditions under which the public may enter the building and use that specific collection.

Paragraph 10. I agree that all depositories should respond to the Biennial Survey. However, section 1909 which contains this requirement leaves a reasonable doubt if it applies to "law" designations.

Proposed Guidelines

Paragraph 1-1. I have no objection with the statement "to make U.S. government publications easily accessible to users". However, I suspect the compilers intended that this paragraph would parallel the statement in the Proposed Objective - "for use by the general public". See the comments above on Proposed Objective.

Paragraph 2-1. The statement "new federal publications" is sufficiently broad. However, as noted above, sections 1901 and 1902 limit the types of federal publications which may be distributed to depositories.

Paragraph 2-4. The term "reference value" should be deleted and substituted by specific terms mentioned in sections 1901 or 1902: i.e. "informational matter"; have "public interest or educational value"; or "for public information". The term "reference" is also too restrictive. Librarians often associate the term with materials found in a reference room.

Paragraph 2-13. I agree philosophically with the statement, but I question whether it belongs. There is no statutory authority for this. The earlier collection maintained by the GPO Library was based on a broad interpretation of the law that it was needed for cataloging purposes. We are grateful the law was stretched in order to preserve this collection. Since this represents such a major change I suggest it remain only in the section on proposed changes.

Paragraph 2-15. Substitute "request Congress for additional funds" or "allocate additional funds" for the statement "Provide additional funds". The paragraph asks the Superintendent of Documents to provide additional funds to himself, whereas he has to get them from Congress.

Paragraph 2-16. I agree with the policy of providing advance notification of inspections. This paragraph, unlike 2-13, sticks to the wording of the Act, namely that inspections should be conducted only to "investigate conditions for which need is indicated". Actually, we prefer to interpret section 1909 broadly as authorizing the Superintendent of Documents to conduct inspections of all designated depositories on a regular cycle, irrespective of a report of unsatisfactory conditions. This aspect of the Act needs clarification as well as the fact his authority for inspection and the Biennial Survey is contained in section 1909 which apparently applies only to "congressional" designations.

Paragraph 3-1. This statement is not clear. It appears to imply that there may be only two depositories in a Congressional district, whereas in fact there may be more than two Representative designations alone (as a result of redistricting) plus any possible number of Senatorial and "law" designations in the same district. For example, North Dakota is a single district state which has 10 depositories. The statement - "two at large designated by Senators" - should be amended to add "within the State".

Paragraph 3-2. This is not true. It gives a totally false interpretation of section 1911. See my discussion for paragraph 9, Minimum Standards above. Depository publications only must be "made available for the free use of the general public" - and not the entire library. There is also the question whether section 1911 applies to "law" designations.

Paragraph 3-4. The requriement for 10,000 books is mentioned in section 1909 which apparently applies only to "congressional" designations. Clarification of the Act is needed. Do some of the authorized "law" designations really need 25,000 titles, or even 10,000 books?

Paragraph 3-7. Who should make known the vacancy, and when? At present the JCP Committee Print makes this known annually. The guidelines should probably require the GPO to supply notification as soon as possible of any new vacancy when they occur. This paragraph should also require notification of the appropriate regional library. The guidelines in paragraphs 3-7, 3-8, and 3-9 should clearly indicate they apply only to "congressional" designations.

Paragraph 4-1. The requirement for a "basic reference collection" should apply only to "congressional" designations, and possibly to two sub-groups of "law" designations (state libraries and land grant colleges).

Paragraph 4-2. This requirement should be limited to "congressional" designations, and possibly to state libraries and land grant colleges. The same comment applies to paragraphs 4-5 and 4-6.

Paragraph 5-2. The Superintendent of Documents has publicly stated he would accept an option of stamping either date of receipt or date of shipping list. However, he has yet to announce this change in an official medium. The Editor, Public Documents Highlights has indicated he would publish this policy in the next issue.

Paragraph 5-4. Substitute the term "holdings records" or "record of holdings" for "shelf list". The term "shelf list" implies that records must be filed in shelf list order, or SuDocs class number order. Other filing arrangements for holding records are possible and satisfactory, such as an alphabetical filing arrangement.

Paragraph 5-7. This is impractical for many libraries which integrate all or some of their depository publications. It shows a separate collection bias, where the 10 day requirement may indeed be generous. However, for integrated materials it would require libraries to provide an unwarranted priority by cataloging and serials departments to process depository materials ahead of regular library materials. A separate collection is

provided with a ready made classifcation (and filing) number. An integrated collection requires a classification number from the Library of Congress (which catalogs a low percentage of government publications, and slowly at that) and/or original cataloging by the individual library.

Paragraph 8-8. I don't think a library should be required to provide reader/printers just for depository materials. Most libraries require readers for regular library materials, and should be expected to provide these as a minimum for depository microforms.

Paragraph 8-9. I don't agree. The government should not dictate to a library how it will organize its microform collection for service. These guidelines (or the Instructions to Depository Libraries) have not dictated a separate collection for hard copy materials; so why must they dictate a separate collection for depository microforms.

Paragraph 9-1. Same comment as paragraph 3-2.

Paragraph 11-2. Add the underlined word: "Selective depositories will cooperate in building up the retrospective collections of the regional depositories". If you mean non-depository publications, these guidelines are not a proper place for the government to state such a requirement. I assume you mean to help fill in gaps for the period before the regional became a depository, and/or before it became a regional or an "all" depository, or to substitute for missing or damaged publications.

Paragraph 11-8. I don't agree. The policy of a library for providing photocopies of depository publications should (at most) be no less liberal than that provided for regular library materials. Either delete this paragraph, amend as indicated, or recommend that the federal government provide reimbursement for photocopies provided.

Paragraph 12-1c. Substitute the word "libraries" for "people". A regional may serve people (directly) within its Representative District, but its regional functinn is to serve libraries. These selective depositories serve people; thus the regional indirectly serves people outside its district.

Paragraph 12-3. See comment for paragraph 4-1.

Proposed Changes

Paragraph 1c. The law regarding the inspection authority of the Superintendent of Documents should be clarified. At present, the authority is contained in section 1909 which pertains to "congressional" designations. This leads to doubt if the authority applies also to "law" designations. Also, the Act implies that inspections should be made only for cause: i.e. in case of unsatisfactory conditions when "need is indicated". I agree that all depository libraries should be inspected on a regular two year cycle.

Paragraph 2. This pertains primarily to chapter 17, Title 44, U.S.Code and not to chapter 19. I think the law should be completely overhauled to reflect the realities of the current situation. Section 1710 (from the General Printing Act of 1895) still requires a "comprehensive index" at the close of each regular session of Congress. During its long history (53d-74th Congress) the Document Catalog was in compliance for only gress (the 54th). One combined catalog was published for the other Congresses, instead of one per regular session. The Document Index was discontinued following the 72d Congress.s The Monthly Catalog now serves as the "comprehensive index" in accordance with a JCP Resolution of March 24, 1947. However, the Resolution is deficient since it states that the "annual index of the Monthly Catalog" will provide a satisfactory substitution. The December index is not worth much without the listings in the January-December catalogs. The Resolution is not clear on this point. As for the ideal of a "comprehensive index" of U.S. publications this may have been possible or even feasible in 1895. At that time Congress was the main branch of government, the executive department was small and somewhat concentrated in Washington, and a central printing plant for all publications was possible. However, the executive department is now the predominant branch of the federal government, and literally dwarfs the publications activities of the congressional branch. In addition to the GPO central printing plant, over 300 field printing plants have been authorized throughout the world, plus technology has expanded the development of reproduction equipment available to any government office. A single "comprehensive index" is no longer practical, feasible, or even desireable.

Paragraph 3a. It is now possible for a new designation to be made without the knowledge of the state library as well as the regional library. The Act states that either "every existing depository library within the congressional district ... or the head of the library authority of the State" may certify the need for the new depository. The underlined word "or" should be changed to "and", plus the regional library should be included so that all three groups are notified.

Paragraph 3b. The requirement for 10,000 books comes from section 1909 which pertains to "congressional" designations. I think that a requirement of 25,000 titles for them is proper, but may not be for some categories of "law" designations.

Collections. This paragraph should apply only to "congressional" designations, and possibly also to state libraries and land-grant colleges. As for the "undue burden on the small library", this is the type of "congressional" designation which needs additional financial support in order to fulfill the objective of the Depository Library Act for that group of depositories, especially to make documents equally available to all citizens throughout the country.

APPENDIX E

RESPONSE TO THE REQUEST FOR COMMENTS
ON THE PROPOSED STANDARDS AND GUIDELINES

Presented by Dan MacGilvray, Editor, Public Documents Highlights
at Spring Meeting, Depository Library Council to the Public Printer
held in Columbus, Ohio, April 22-23, 1976

Copies of the "Proposed Standards & Guidelines" went out to depository libraries during January 1976 with a request for their comments and criticisms. The first batch of replies is being turned over to the Advisory Council at their April meeting in Ohio by the editor of Public Documents Highlights.

The comments have been organized in the following way. The original versions have been grouped and copied. The copies have been broken down into specific points of the "Guidelines" addressed. A system of labeled manilla envelopes then groups the comments. This will assist the Committee on Standards by facilitating their examination of comments on any single point, and thereby aid the revision process.

To date, twenty-eight responses have been received. They range from comment on only one point to an eight-page in-depth analysis of the legal basis of depository requirements. Of some one hundred and sixty-two possible points which should be considered, seventy-four have been commented upon.

The greatest number of comments has focused on three points: (1) the suggestion that at least twenty-five percent of the available items on the Classified List be selected as a necessary minimum for depository status; (2) that all depositories provide a reasonable number of photocopies on request; (3) that depositories receive the twenty-one titles on the recommended list.

A general consensus of all commentators is that the drafting of the "Guidelines" marks a significant step in the documents field. The opportunity for participation by depository librarians is much appreciated. They feel they have a genuine role to play in the shaping of "Standards & Guidelines" which will affect them in future years.

It is the present intention of GPO not to re-draft its official requirements for depository libraries until the Advisory Council has prepared and submitted the final version of the "Guidelines" to the Public Printer.

ENCLOSURE
Tabulation of
Points Addressed

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